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September 15, 2022

Hon. Denise L. Cote, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

Re: U.S. v. Mahmoud Thiam, Docket No. 17-CR-47 (DLC)

Your Honor:

I respectfully write, with the consent of the Government and the Probation Office, to request permission for defendant Mahmoud Thiam to travel to France between October 6 and October 27, 2022. The purpose of this visit is to be with his 79-year-old mother, Fadim Thiam, who will be in France during October for medical treatment.

Fadim Thiam is in poor health and has undergone several major surgeries (a letter from her treating physician has been provided to the Government and can be provided under seal to this Court upon request). She has been refused permission to enter the United States to visit Mr. Thiam and is concerned that she might never see him again before she dies. She badly wants him to be at her side when she is in France next month.

Mr. Thiam will depart New York for Paris on October 6, 2022 and will return from Paris to New York on October 27. While in France, he will stay at the home of his sister Aicha Traore-Hecquet at 52 Rue de la Foret Verte, 786109 Le Perray en Yvelines, which is a suburb of Paris. He will stay there during the entirety of the trip and will not spend the night at any other location and/or travel outside the area of Paris and its suburbs.

Mr. Thiam's family has committed to cover the cost of his plane tickets, and his living expenses in France. Given that he will be staying with his sister's family, he will not incur any lodging expenses.

Counsel for the government, as well as the Probation Office, have stated that they consent to the proposed travel.

The Court's consideration in this matter is appreciated.

Respectfully submitted,

/s/ Jonathan I. Edelstein


Jonathan Edelstein

Cc: All Counsel (Via ECF)

Application GRANTED

SO ORDERED

September 16, 2022



DENISE COTE
United States District Judge